

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ELIZABETH COBLE, MILAGROS HARPER, and
DENNIS HARPER, on behalf of themselves and all others
similarly situated,

Plaintiffs,

-against-

COHEN & SLAMOWITZ, LLP, DAVID COHEN, ESQ.,
MITCHELL SLAMOWITZ, ESQ., LEANDRE JOHN,
ESQ., and CRYSTAL S.A. SCOTT, ESQ.,

Defendants.

Civil No.:
11-CV-1037 (ER)(GAY)

**DECLARATION OF THOMAS A. LEGHORN IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFFS' MOTION TO AMEND THE COMPLAINT**

Thomas A. Leghorn hereby declares under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am a member of the Bar of this Court and a partner at the law firm of Wilson Elser Moskowitz Edelman & Dicker, LLP, counsel for Defendants Cohen & Slamowitz, LLP, David Cohen, Esq., Mitchell Slamowitz, Esq., Leandre John, Esq., and Crystal S.A. Scott, Esq. (collectively the "Defendants").

2. I make this declaration in support of Defendants' Opposition to Plaintiffs' Motion to Amend the Complaint.

3. Attached hereto as "Exhibit A" is a true and correct copy of the Affidavit of Leandre John, the Managing Attorney employed by Cohen & Slamowitz, LLP.

4. Attached hereto as "Exhibit B" is a true and correct copy of an excerpt from the deposition of Joseph Mauro, held in the above captioned matter on May 31, 2012.

Dated: New York, New York
February 1, 2013

Respectfully Submitted,
WILSON, ELSER, MOSKOWITZ, EDLEMAN & DICKER

By: 

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Attorney for Plaintiffs

CERTIFICATE OF SERVICE

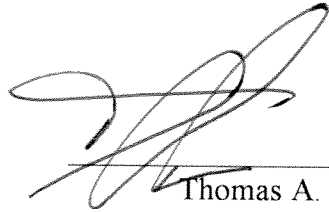
I, Thomas A. Leghorn, certify that I am and at all times during service of process was not a party to the above matter nor less than 18 years of age. I further certify that on February 1, 2013, I served a true copy of DECLARATION OF THOMAS A. LEGHORN IN SUPPORT OF DEFENDANTS' OPPOSITION TO PLAINTIFFS' MOTION TO AMEND THE COMPLAINT, using the CM/ECF system, which sent notification of such filing to the email address designated by the following for that purpose to:

Daniel Adam Schlanger
Schlanger & Schlanger, LLP
343 Manville Road,
Pleasantville, NY 10570

Gary Klein, Esq.
Klein Kavanagh Costello, LLP
85 Merrimac Street, 4th Floor
Boston, MA 02144

Under penalty of perjury, I declare that the foregoing is true and correct.

Dated: New York, New York
February 1, 2013

A handwritten signature in black ink, appearing to be 'T. Leghorn', written over a horizontal line.

Thomas A. Leghorn